

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

Dana Albrecht,

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Plaintiff,

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v.

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Civil No. 1:23-CV-00381-JL-TSM

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Kathleen Sternenberg, *et al.*

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Defendants.

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**STATE DEFENDANTS DALPRA, INTROCASO, DERBY, KING AND NH JUDICIAL
BRANCH'S MOTION TO EXTEND RESPONSIVE PLEADING DEADLINES**

Defendants Bruce F. Dalpra, Julie A. Introcaso, Mark S. Derby, David D. King, and the NH Judicial Branch (hereafter, "State Defendants"), by and through counsel, the NH Office of the Attorney General, file this Motion to Extend Responsive Pleading Deadlines, stating as follows:

1. Plaintiff filed this Complaint on August 4, 2023 and some or all of the Defendants were served shortly thereafter.
2. Plaintiff has listed six defendants and forty causes of action in his Complaint. The AGO anticipates that it needs an additional 60 days to formalize its representation and prepare responsive pleadings due to the nature and number of the allegations and defendants.
3. There is no reason to believe that this extension will cause Plaintiff unfair prejudice, as his allegations are based on purported conduct that is not ongoing.
4. No memorandum of law is required, as this matter rests within the sound discretion of the Court.

5. The NH Office of the Attorney General reached out to Plaintiff to obtain his assent to an extension of the deadline to file a responsive pleading, but the Plaintiff indicated he assents only to an extension of time to file an *answer*.

WHEREFORE, State Defendants respectfully requests that this Honorable Court:

- A. Grant this Motion;
- B. Set Defendants' deadlines to file a responsive pleading for Monday, November 6, 2023; and
- C. Grant any further relief that justice may require.

Respectfully submitted,

Bruce F. Dalpra, Julie A. Introcaso, Mark S. Derby,
David D. King, and the NH Judicial Branch

By their attorney,

THE OFFICE OF THE ATTORNEY GENERAL

Dated: September 7, 2023

/s/ Christopher Bond

Christopher G. Bond, Bar #20161
Associate Attorney General
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Concord NH 03301
christopher.g.bond@doj.nh.gov

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was sent by ECF on September 7, 2023 to the parties and/or counsel of record.

/s/ Christopher Bond

Christopher G. Bond